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## United States Attorney

District of Nevada

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## Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RAFAEL RODRIGUEZ LOBAINA,  
Plaintiff,  
v.  
KILOLO KIJAKAZI,  
Commissioner of Social Security,  
Defendant.

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion to Remand (Dkt. No. 16, filed on April 20, 2023), currently due on May 22, 2023, by 45 days, through and including July 6, 2023. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Defendant respectfully requests this additional time because counsel is currently in the process of determining if a settlement agreement is possible. If the case cannot be settled, then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Motion to Remand. This request is made in good faith and with no intention to unduly delay the proceedings.

On May 18, 2023, counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion.

It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's Motion to Remand, through and including July 6, 2023.

Dated: May 18, 2023

Respectfully submitted,

JASON M. FRIERSON  
United States Attorney

*/s/ David Priddy*  
DAVID PRIDDY  
Special Assistant United States Attorney

**IT IS SO ORDERED:**

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**UNITED STATES MAGISTRATE JUDGE**

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DATED: 5-25-2023

## **CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorney for Plaintiff

Dated: May 18, 2023

/s/ David Priddy  
DAVID PRIDDY  
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